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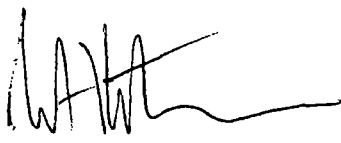
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Memorandum

TO: Barbara O'Grady, CDPHE

FROM: Victor Ketellapper, USEPA 

SUBJECT: May 2004 Monthly Progress Report on the Remedial Action at the Vasquez Boulevard/Interstate 70 Superfund Site, Operable Unit 01

This monthly progress report was prepared and submitted to the Colorado Department of Public Health and the Environment as required in the *Superfund State Contract for Remedial Action Implementation, Vasquez Boulevard/Interstate 70, Operable Unit 01*. The report describes the work completed during the preceding month for each activity, a summary of expenditures, a summary of change orders and claims, and a description of whether the project is on schedule and within budget, and an estimate of variances expected at the project completion.

Activities Completed During the Month

The following is a summary of the activities completed for each component of the remedy during the month. A summary of the funds obligated and the actual expenditures that occur during the month for each component of the remedy is found in the attached table.

Soil Removal and Replacement

Status or Soil Removal Cleanups

| | |
|---------------------------------------|-----|
| Properties Completed In 2003 | 133 |
| Properties Completed through May 2004 | 100 |
| Total Properties Completed | 233 |
| Estimated Cleanups Required | 853 |

- Cleanups conducted prior to signing the State Superfund Contract (SSC) were completed as part of the Non-Time Critical Removal Action.
- Property owners were contacted to obtain access for the clean up and develop restoration agreements.
- Began preparing subcontracts for sprinkler system replacement and exterior lead based paint evaluation and abatement.
- Weekly construction meetings were held every Wednesday.

Community Health Program

- Continued efforts to develop the Community Health Program. The City of Denver, the CDPHE, Community Groups and EPA are working together to develop a strategy to implement the community health program.

Soil Sampling

- A task order was issued to URS Operating Services, EPA STARTII Contractor for Region VIII to conduct soil sampling of the properties which have not been previously sampled and management of the site database. The task order was funded with \$250,000 to conduct this work.
- Procuring access and sampling residential properties were conducted
- Issued results letters to property owners.
- Updated site database.

Change Orders and Claims

None

Project Status

The remedial action at Operable Unit 01 of the Vasquez Blvd/Interstate 70 Superfund Site is planned to be completed on September 30, 2006. The budget with contingency is \$26 million. The project is currently on schedule and within budget.

Variances Expected

An agreement-in-principle regarding ASARCO's liability for Operable Unit 1 of the VB/I70 Site has been reached. The agreement will allow EPA to place excavated residential soils on the ASARCO Globe Plant permanently. The VB/I70 Site soils to be placed on the Globe Plant are to be managed by ASARCO under the guidelines established by the State of Colorado for the ASARCO Globe Plant Superfund Site Cleanup. In addition, ASARCO will conduct soil remediation at 100 properties located within the VB/I70 Site. A consent decree to formalize this agreement is being negotiated.

Background

The VB/I70 Site covers an area of approximately four and a half square miles in north-central Denver, Colorado. For the purpose of investigation and remediation, the site has been divided into three operable units. OU1 is composed of a number of the City and County of Denver neighborhoods that are largely residential, including Swansea/Elyria, Clayton, Cole, portions of Globeville and a northern portion of Curtis Park. Approximately 4,000 residential properties are located within OU1.

The Record of Decision (ROD) , signed on September 25, 2003, selected the remedy for OU-1.

The remedial action selected for this project includes the following components:

1. Removal and replacement of soils on residential properties that the action level of lead or arsenic has been exceeded. The soil action levels selected in the ROD are 400 parts per million (ppm) and 70 ppm, respectively. The remedy also allows for the abatement of exterior lead based paint to prevent the recontamination of soils that have been remediated.
2. Conducting a Community Health Program during the duration of the soil cleanup activities.
3. Soil sampling of residential properties that have not been adequately evaluated for lead and arsenic.

Soil Removal and Replacement

Soil removal and replacement will occur at properties that have levels of lead and/or arsenic in the soil greater than the action level as described in the ROD. For properties which soil removal is conducted, all accessible soil will be removed to a depth of 12 inches. The excavation areas will be backfilled with clean soil, and yard features will be restored to the extent practicable, in consultation with the property owner. All excavated soils will be transported to an acceptable receiving facility.

Soil removal and replacement will include the following activities:

1. Access Agreements and Property Owner Authorization
2. Property Specific Design
3. Evaluation of Exterior Lead Based Paint
4. Supplemental Sampling of Garden Areas
5. Lead Based Paint Abatement if Needed to Protect the Soil Replacement Remedy
6. Soil Removal
7. Soil Transportation and Disposal
8. Backfill and Restoration of Excavated Areas
9. Post Construction Maintenance
10. Follow-Up Activities

A detailed description of each of these activities is found in the "Remedial Design Work Plan for Soil Sampling and Remediation Program" dated March 2003.

Community Health Program

The Community Health Program consists of community and individual health education, a biomonitoring program to measure urinary arsenic levels and blood lead levels in children, and a response programs that includes the necessary follow-up environmental sampling, home investigations, and referral to programs available to conduct response actions. The first element will address risks to area children from sources of lead. The second element will be designed to

address children with soil pica behavior, to reduce their risks to arsenic in soil above 47 ppm. Participation in the program will be voluntary. The Community Health Program will be implemented on an ongoing basis until the residential soil removal portion of this remedial action has been completed.

The "Community Health Program Design Work Plan" dated March 2003 provides guidelines for implementing the Community Health Program. Specific actions conducted as part of the Community Health Program will be tailored to each of the neighborhoods within the Site.

Soil Sampling

A program of on-going sampling will be implemented for lead and arsenic at all residential properties within the Site that have not already been adequately tested. This sampling program will continue through the completion of the soil removal portion of this remedy.

Vasquez Boulevard/Interstate 70 Superfund Site
 Project Expenditures
 For May 2004

| Item | Funds Obligated | This Month | Expenditures Previous | Total | SSC Budget |
|---|--------------------|---------------|--------------------------|---------|---------------|
| Residential Property Cleanup | | | | | |
| Army Corps of Engineers IAG # DW-96-9539110-0 | \$5,385,000 | \$0 | \$203 | \$203 | |
| Community Relations Plan | \$65,000 | \$0 | \$0 | \$0 | |
| Subtotal - Residential Property Cleanup | \$5,450,000 | \$0 | \$203 | \$203 | \$21,500,000 |
| Community Health Program | | | | | |
| City of Denver | \$0 | \$0 | \$0 | \$0 | |
| CDPHE - Environmental Epidemiology | \$0 | \$0 | \$0 | \$0 | |
| Subtotal - Community Health Program | \$0 | \$0 | \$0 | \$0 | \$1,500,000 |
| Soil Sampling | | | | | |
| URS - START 2 Contract TDD 0305-0005A (1) | \$250,000 | \$8,506 | \$0 | \$8,506 | \$400,000 |
| Subtotal - Soil Sampling | | \$8,506 | \$0 | \$8,506 | |
| Total Expenditures/Budget | \$5,700,000 | \$8,506 | \$203 | \$8,709 | \$23,400,000 |
| Contingency | | | | | \$2,600,000 |
| Total Budget | | | | | \$26,000,000 |

Notes:

1) \$50,000 of the funds in this TDD were obligated prior to the beginning of this RA. The expenditures shown only reflect only the portion of the funds expended as part of the remedial action.